

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHAEL J. GOODMAN and LINDA BROWN, individually and on behalf of all others similarly situated,)	CASE NO. CV-09-5603 (LDW)(ARL)
Plaintiffs,)	
GENWORTH FINANCIAL WEALTH MANAGEMENT, INC., GENWORTH FINANCIAL, INC. and GURINDER S. AHLUWALIA,)	STIPULATION AND ORDER
Defendants.)	
)	
)	

STIPULATION AND ORDER FOR JOINDER OF PARTIES

WHEREAS, on May 4, 2011 the Court entered a Scheduling Order in the above-captioned litigation;

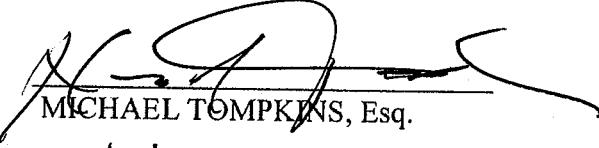
WHEREAS, it was agreed upon by the parties and ordered by the Court to extend the time for additional parties to join the litigation to September 15, 2011;

WHEREAS, Mr. Ed Schiller seeks to join the litigation as a plaintiff pursuant to the Scheduling Order and Rule 20 of the Federal Rules of Civil Procedure.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants that in the above-captioned action, if the Court so orders, Plaintiffs may add Mr. Ed Schiller as Plaintiff. Once so ordered and leave granted to amend the complaint, Plaintiffs will produce Mr. Schiller's documents in discovery pursuant to the parties' agreement, which was filed with the Court as Docket No. 47. Plaintiffs will also produce a time and date for the deposition of Mr. Schiller to be conducted before October 15, 2011 or a mutually convenient date.

LEEDS MORELLI & BROWN, P.C.
ATTORNEYS FOR PLAINTIFF
One Old Country Road, Suite 347
Carle Place, New York 11514
(516) 873-9550

By:


MICHAEL TOMPKINS, Esq.

Dated:

9/15/11

SNR DENTON
ATTORNEYS FOR DEFENDANTS
1221 Ave. of Americas
New York, NY 10020-1089
(212) 768-6700

By:


BRENDAN ZAHNER, Esq.

Dated:

9/15/11